

1 BRET O. WHIPPLE, ESQ  
2 Nevada Bar Number 6168  
3 **JUSTICE LAW CENTER**  
4 1100 S. Tenth Street  
5 Las Vegas, Nevada 89104  
6 (702) 731-0000

7 **UNITED STATES DISTRICT COURT**

8 **DISTRICT OF NEVADA**

9 THE UNITED STATES OF AMERICA,

10 Plaintiff,

11 Vs.

12 CLIVEN D. BUNDY,

13 Defendant.

CASE NO.: 2:16-cr-00046-GMN-PAL

14 **DEFENDANT CLIVEN D. BUNDY'S**  
15 **NOTICE OF EXPERT WITNESSES**

16 COMES NOW, BRET O. WHIPPLE, ESQ., counsel for CLIVEN D. BUNDY, ESQ.,  
17 and hereby enters the following notice of expert witnesses.

18 DATED THIS 6<sup>th</sup> day of November, 2017

19 **JUSTICE LAW CENTER**  
20 /s/ Bret O. Whipple, Esq.  
21 Bret O. Whipple, Esq.  
22 Bar No 6168  
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**MEMORANDUM OF POINTS AND AUTHORITIES**

This is Defendant CLIVEN D. BUNDY'S notice of expert witness. Under Federal Rule of Criminal Procedure 16(b)(1)(C), Bundy hereby gives notice that he intends to call JASON KING, as an expert witness on his behalf.

**I. QUALIFICATIONS OF MR. KING**

Jason King is currently the Nevada State Engineer. He joined the Nevada Division of Water Resources as a Hydraulic Engineer in 1991. Since that time, he has worked as Chief of the Engineering and Dam Safety Section, Chief of the Water Rights Section, Deputy State Engineer and was Acting State Engineer before being appointed to Nevada State Engineer in April 2010. The State Engineer's Office is responsible for the appropriation, adjudication and regulation of all waters within the state, and has oversight of water well drilling activities, dam safety, water planning and floodplain management. Jason has negotiated on Nevada's behalf on numerous interstate water disputes and is a member of the State Environmental Commission. Jason earned his Civil Engineering degree from the University of New Mexico and is a Registered Professional Engineer.

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1 **II. SUMMARY OF MR. KING'S TESTUMONY**

2 Jason King will testify on: Nevada water rights and infrastructure, Nevada water law,  
3 water right improvements upon the land, how water rights are acquired, used, and administered  
4 in Nevada, and the relationship between Nevada's management of water within the State and  
5 Federal law.  
6

7 DATED THIS 6<sup>th</sup> day of November, 2017  
8

**JUSTICE LAW CENTER**

/s/ Bret O. Whipple, Esq.

Bret O. Whipple, Esq.

Bar No 6168

JUSTICE LAW CENTER  
Tel (702) 731-0000 Fax (702) 974-4008

**CERTIFICATION OF SERVICE**

I hereby certify that on the 6<sup>th</sup> day of November, 2017 a true and correct copy of the foregoing NOTICE OF EXPERT WITNESS was delivered via E-filing to:

DANIEL BOGDEN  
United States Attorney

STEVEN MYHRE  
First Assistant United States Attorney

NICHOLAS DICKINSON  
Assistant United States Attorney

NADIA AHMED  
Assistant United States Attorney

ERIN M. CREEGAN  
Assistant  
United States Attorney

501 Las Vegas Blvd. South, Suite 1100  
Las Vegas, NV 89101

/S/ Tatum Wehr  
An Employee of Justice Law Center

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